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11 NICHOLLE VANNUCCI, ELLEN  
12 BROWN and DEBORAH DRAKE,  
13 individuals; and HOMELESS ACTION!,  
an unincorporated  
association,

14 Plaintiffs,

15 v.

16 COUNTY OF SONOMA, SONOMA  
17 COUNTY COMMUNITY  
18 DEVELOPMENT COMMISSION, CITY  
19 OF SANTA ROSA, and DOES I to XX,

Defendants.

CASE NO. 3:18-CV-01955-VC

**DECLARATION OF KELLI  
KUYKENDALL IN OPPOSITION  
TO MOTION TO ENFORCE AND  
CLARIFY PRELIMINARY  
STIPULATED INJUNCTION**

Date: December 3, 2020

Time: 10:00 a.m.

Ctrm: 4, 17<sup>th</sup> Floor

Judge: The Hon. Vince Chhabria

20 I, Kelli Kuykendall, declare as follows:

21 1. I am the Homeless Services Manager for the City of Santa Rosa. I have personal  
22 knowledge of the facts set forth in this declaration and if called as a witness could and would  
23 competently testify thereto.

24 2. As the Homeless Services Manager within the Department of Housing and  
25 Community Services I assist Director David Gouin in management of the various policies and  
26 programs the City has underway to assist those experiencing homelessness. Either I or Mr. Gouin  
27 chair meetings of the Homeless Action Team ("HAT") and the Homeless Encampment  
28 Assistance Program ("HEAP"), policy and operational teams, respectively, organized to

1 coordinate the City's response to homelessness. I also work closely with Jennielynn Holmes, the  
2 Director of Catholic Charities who, per contracts with the City, operates our Samuel L. Jones  
3 Hall Homeless Shelter, the Family Support Center, the Homeless Services Center, the Homeless  
4 Outreach Services Team ("HOST") who provide outreach to individuals experiencing  
5 homelessness, and COVID-19 programs, including the Safe Social Distancing Program and  
6 Non-Congregate Shelter (hotel rooms).

7       3. Our Homeless Encampment Assistance Program has been in place for several  
8 years. It is a multi-disciplinary team focused on a compassionate approach to address the  
9 health, safety, and shelter needs of persons living in encampments and to ease impacts to  
10 surrounding communities. It began as a means by which to assess where encampments existed  
11 and what conditions were present requiring our assistance. The City prioritizes encampments  
12 based on the following criteria: the number of individuals estimated at the site and an assessment  
13 of their vulnerability due to living outdoors, associated health, safety, and fire risks, and property  
14 ownership.

15       4. HEAP is comprised of representatives from police command staff, the DET, Fire,  
16 Parks, Water, Public Works, as well as a representative from Catholic Charities. HEAP meets  
17 every week to discuss known encampments, prioritize which to address and how best to do so.

18       5. As the "A" in HEAP says, HEAP is intended to be more than a means by which to  
19 resolve encampments. Our mission is to "assist" those in encampments by leading our efforts  
20 with outreach, engagement and the provision of services and continuing this approach following  
21 the resolution of each encampment. This has been particularly important since the COVID  
22 pandemic began in February and March. The City is aware of CDC Guidelines regarding the  
23 unsheltered homeless and we have encouraged those in encampments to set up their tents with at  
24 least 12' by 12' space between and provided masks as resources allowed as well as sanitary  
25 facilities to help prevent the spread of COVID-19. The Finely Center Social Distancing site  
26 described in Mr. Gouin's declaration was specifically designed to provide such an option to  
27 individuals in crowded encampments. Changes in the layout of our Samuel Jones shelter were  
28 also made with this in mind.

1       6. Working with our counterparts at the County, and mindful of CDC Guidelines  
2 recommending encampments, as much as possible, have hygienic bathroom and handwashing  
3 facilities, the HEAP committee canvassed the various encampments in the City of which we were  
4 aware, as well as locations in the community where individuals experiencing homelessness  
5 frequented, to determine how best to distribute porta-potties and hand washing stations. We  
6 placed two units at Prince Memorial Greenway, three units at Corporate Center Parkway, one  
7 unit at the Bennett Valley Senior Center, two units in the City Hall parking lot, two in the  
8 Highway 101 underpasses, one near the College Avenue underpass, one at West Steele Lane and  
9 Guerneville Road, one at South A Street and Earle, one in the 6th Street underpass, two units at  
10 the Homeless Services Center and one at Fremont Park, later supplemented with two more.  
11 These units were regularly serviced and cleaned and remained on site until such time as  
12 encampments were closed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

15 Executed on November 4, 2020, Santa Rosa, California.

Kelli Kuykendall  
KELLI KUYKENDALL